

Submission by Cllr John Walsh

29 August 2022

Secretary
An Bord Pleanála
64 Marlborough St
Dublin 1

John Walsh
10 Ashleigh Court
Castleknock
Dublin 15

Re: Case reference: HA29N.313892 – Blanchardstown to City Centre, Bus Connects Core Bus Corridor

Dear Secretary,

The proposed Core Bus Corridor from Blanchardstown to the City Centre is an important development and is welcome in principle, offering the prospect of improved bus services and enhanced facilities for cyclists and pedestrians.

But I wish to raise a number of detailed concerns in relation to undesirable or damaging impacts on the local environment, particularly linked to removal of trees, implications for local green spaces, impact on visual amenity and detrimental implications residential amenity. I hope the Board will have regard to these specific concerns which are important to local communities living along the route. A public project such as Bus Connects is potentially very valuable and has to work for communities along the route as well as commuters from further afield.

Blanchardstown/Millstead

The original proposal for ramps onto the N3 and associated works had a major impact on the cul-de-sac and the green space at Millstead and would have impacted severely on residents' quality of life. This has been amended in the final plans following submissions by residents to allow access to the bus stop through Mill Road rather than the cul-de-sac of Millstead estate. **The Board should confirm in any decision that pedestrian ramps are separated from Millstead estate by a retaining wall and should not impinge directly on the estate to protect residential amenity and quality of life for residents.**

I wish to raise concerns about the environmental impact of the works very close to the bank of the Tolka on the northern side of the N3 under the bridge on Mill Road. A large-scale concrete ramp and public lighting could seriously damage the ecosystem along that part of the river and adversely impact on the animals and birds which inhabit that area. Also the proposed cutting down of trees to build ramps should be minimised as much as possible. If the ramps go ahead, existing trees should be protected as much as possible and full mature trees must replace those currently in situ where trees are removed.

Castleknock Manor/Auburn Avenue – protection of tree line and habitat

The NTA amended its original proposal to remove the proposed cycle track along the N3 opposite Castleknock Manor, which is replaced by a cycle lane within a 'Quiet Street' format along the Old Navan Road/Castleknock Manor between St Brigid's GAA club and the Auburn Avenue roundabout. This change in the plan is welcome as the original proposal would have destroyed the tree line which serves as an essential visual and noise barrier for residents and led to unnecessary and unacceptable destruction of trees: it would also have severely compromised an important habitat for minor bees and removed a habitat for foxes and badgers opposite Auburn Green.

The Board should include a condition in any planning decision on this application that the tree line at this location will be fully protected. Residents have continuing concerns over the impact on trees close to the Auburn Avenue roundabout (Auburn Green), at the bus stop and at the entry to the new cycle lane close to the entrance of St Brigid's GAA club.

The current proposal involves an expansion of the Auburn Avenue/Castleknock Manor roundabout. This will lead to compulsory purchase and some loss of land on Auburn Green, which is already a very small space heavily used by local residents, particularly children for active recreation. The plans should be amended to preserve Auburn Green and avoid any destruction of trees or loss of amenity to residents here.

Ashtown

The proposal involves the conversion of the Ashtown roundabout to a signalised junction. I have serious reservations about this proposal as the experience of new or expanded signalised junctions in Dublin 15 has been negative, notably at the junction of Castleknock Road and College Road in Castleknock village. The removal of the roundabout is likely to back up traffic in different directions and intensify traffic congestion on Castleknock Road, the route from Ashtown and the N3 itself. The proposal could be re-considered instead to expand pedestrian crossings and create cycle lanes close to this roundabout. The relocation of the Edmund Rice Schools Trust (ERST) school to its new building on the old Phoenix Park Racecourse site should be considered in planning for Ashtown, as this is likely to intensify school traffic along this section of the N3 at am peak times and afternoon school closing time.

The plan should continue to provide for a safe pedestrian crossing for residents in the Phoenix Park development/apartments: as indicated on map 21, the existing Toucan crossing here should be maintained here in addition to any pedestrian linkages at the roundabout itself.

While the proposed signalised junction and toucan crossings at the roundabout outside the Ashtown Gate of the Phoenix Park are welcome, it is important to maintain access inbound to the city centre from Castleknock Road to Blackhorse Avenue – it is not clear from the map whether the 'no right turn' refers only to the Phoenix Park or Blackhorse Avenue: removing access to Blackhorse Avenue would funnel a greater volume of vehicular traffic through the Ashtown roundabout and onto the same route as the Core Bus Corridor which would be counter-productive to the objectives of Bus Connects.

Destruction of trees, Navan Road

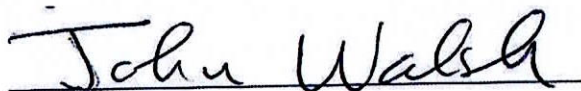
The Board should address the significant detrimental impact of the CBC on the mature roadside trees along the Navan Road. A very substantial number of trees are being removed on the N3, both between the Navan Parkway train station and Ashtown and from Ashtown to Cabra Cross, in tandem with CPOs for front gardens of numerous properties along the Navan Road. It is very disappointing that the Non-Technical Summary indicated that (p.38) '...it will not be possible or practical to mitigate against impacts on landscape (townscape) and visual characteristics resulting from the removal of mature trees to facilitate construction.'

This is the single most negative consequence of the current Bus Connects plan. The trees on the Navan Road from the M50 interchange as far as Ashtown will be almost entirely eliminated. The street trees on the Navan Road from the Ashtown roundabout to Cabra Cross will be reduced by at least 150 in the NTA proposal. These trees add to visual amenity, are an essential, long established feature of the streetscape and contribute positively to the mitigation of climate change impacts.

This proposal has a devastating impact on visual amenity for residents and a lasting significant, negative impact on the streetscape. Perhaps even more significant, the removal of such a large volume of trees will result in significant environmental loss which is heavily concentrated on the Navan Road. No amount of replanting over a number of years will restore the streetscape or remedy the impact on residential amenity. It is unacceptable that large-scale removal of trees is still regarded as an inevitable consequence of development.

The NTA successfully explored other options to protect mature trees along other sections of the route and should have done the same here. The Board should seek alternative options to allow the Core Bus Corridor to proceed on the Navan Road while preserving green infrastructure and visual amenity by protecting the mature trees along the route.

I hope that the Board will take these concerns into account in finalising its decision. I would like to participate in any oral hearing that may be convened by the Board.



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